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District Ranger
Andrew Pickens Ranger District
112 Andrew Pickens Circle
Mountain Rest, SC 29664
Submitted electronically to: comments-southern-francismarion-sumter-andrewpickens@fs.fed.us

Re: Guided Wade Fishing on the AP

Dear District Ranger Sitzlar,

We have reviewed your analysis of the Special Use Permit application aimed at increasing commercial angling activities on the Chattooga and Chauga Rivers and are pleased to offer comments.

We do not oppose issuance of the Special Use Permit as it applies to the Chauga River and the Wild and Scenic Chattooga River downstream of Highway 28. These excellent whitewater river reaches, and the Forest Service as their manager, support the full suite of recreational uses. We've seen no indication that these reaches are at or near their capacity, and are generally supportive of angling and other recreational uses of public rivers, guided or otherwise.

We do not support allowing additional commercial angling activity on the Chattooga River upstream of Highway 28.

As a Wild and Scenic River, the Forest Service is bound by law to manage this river reach within its recreational capacity. The 2012 Forest Plan Amendments set explicit capacity limits in terms of People at One Time that vary by reach. The Forest Service does not monitor angling, hiking, and other uses sufficiently to determine whether additional use would exceed these capacities. The Forest Service thus risks exceeding capacity by attracting commercial visitors that otherwise would likely not visit the river, and lacks a defensible way of documenting whether the additional use does or does not violate Forest Plan standards. To take this risk would be irresponsible.

Regardless of capacity, the Forest Service maintains their most extreme visitor use limits in the entire Forest Service System on the Upper Chattooga River. Non-commercial paddling is either banned entirely or by season and flow on these

reaches. The Forest Service has no business growing commercial uses of the Wild and Scenic River while severely limiting or banning non-commercial uses. This gross inequity and unfair pay-to-play concept does not belong on our public lands and waters. So long as the Forest Service maintains on one hand that use of the Upper Chattooga River is severely capacity and conflict constrained, it cannot on the other hand endorse additional commercial recreational use.

Lastly, commercial paddling is entirely prohibited upstream of Highway 28.¹ This prohibition was based on significant and diverse public comments in opposition to commercial use of the Upper Chattooga.² Supporting additional commercial use of one kind while prohibiting others certainly appears as though the Forest Service is wrongly favoring some uses over others.

Thank you for considering these comments.

Sincerely,

Kevin Colburn
National Stewardship Director
American Whitewater

¹ Condition 11 of the Conditions of Self-Registration Permit - Above Highway 28 Bridge states: "Commercial boating is prohibited."

² The Final Environmental Assessment "Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic Corridor" addressed commercial use in Section 1.7 (A). Issue: Concern that commercial boating would be permitted if boating is allowed on any reach in the upper segment of the Chattooga WSR Corridor." The response stated "...none of the alternatives allow commercial boating."